

EXHIBIT 4



1612 Military Cutoff Road, Suite 300, Wilmington, NC 28403
Voice 910.772.9960 Fax 910.772.9062
Web www.rhinelawfirm.com Email attorneys@rhinelawfirm.com

Rhine Law Firm, P.C.

Joel Robert Rhine, founder, has spent his career fighting for justice in complex civil litigation matters while always located within the geographical boundaries of the EDNC. He is a nationally recognized trial attorney who chooses to live on the coast of North Carolina. As head of Rhine Law Firm in Wilmington, he leads the charge on a host of important North Carolina cases, while coordinating the firm's significant participation in large national cases. This unique combination has resulted in a practice focused on complex litigation matters involving class actions and mass torts of numerous types (including institutional sexual abuse cases, substandard military housing, data breach litigation and other subject areas), and significant single-event cases. Mr. Rhine has handled many types of catastrophic personal injury and wrongful death cases, matters involving construction accidents and construction defects, trucking accidents, products liability, nursing home negligence and much more.

Mr. Rhine earned his Juris Doctor degree in 1988 from Wake Forest University School of Law, where he was a member of The Wake Forest Law Review. He was published twice in the Law Review and received the Wake Forest Law Review award. Prior to law school, he received a B.A. from the University of Tampa, where he received an academic scholarship, was inducted into four honor societies, was awarded the Political Science Graduate Award for attaining the highest GPA among Political Science graduates, and lettered on the varsity baseball team.

He began practicing law in Raleigh with Hunton & Williams, working on some of the country's largest cases, including two nuclear power plant construction cases. Thereafter he joined extended family in Wilmington, and at the age of 30, was half of a two-attorney team that obtained an eight-figure verdict in Federal Court – reportedly the largest verdict in New Hanover County history at the time. He has appeared in the Eastern District of North Carolina in 63 cases since 1990. He has been admitted to the Fourth Circuit for decades.

Mr. Rhine filed the first lawsuit in what became the multi-decade, multi-state synthetic stucco (EIFS) litigation, representing thousands of homeowners against a variety of construction industry participants and manufacturers. At the time, the North Carolina Assistant Attorney General declared the EIFS problem to be among the worst consumer crises in North Carolina history. At the first trial EIFS trial, Mr. Rhine helped negotiate a settlement after six weeks of testimony. He later obtained the nation's first verdict against an EIFS manufacturer. This multimillion-dollar verdict was a catalyst for a national EIFS settlement.

Mr. Rhine and his firm have earned significant awards for the people they represent. These include obtaining the largest settlement (\$24 million) in the Chinese Drywall litigation in New Orleans. As class counsel, he obtained a settlement in excess of \$25 million against Pella Windows in the Northern District of Illinois (*Eubank, et al. v. Pella Corporation and Pella Windows and Doors*).

As co-lead counsel in *Fineman et al. v. Marriott Ownership Resorts, Inc, and International Cruise & Excursion Gallery* (United States District Court, Middle District of Florida, No. 3:14-cv-1154), he helped secure a settlement valued at over \$16.5 million.

Mr. Rhine has served as:

- a. co-lead counsel in a data breach case concerning Shorter University in the Northern District of Georgia;
- b. co-lead counsel in approximately 700 Chinese Drywall cases in the Eastern District of Louisiana;
- c. lead counsel in a successful data breach class action, *Boykin v. Tennessee Orthopaedic Alliance, P.A.*, Chancery Court for the State of Tennessee, Twentieth Judicial District, Davidson County, Case No. 20-0615-BC;
- d. co-counsel in class action *Dugan v. Nationstar Mortgage LLC, and ACI Worldwide Corp.* (No. 1:21-CV-341 M.D. N.C.) (settlement over \$10,500,000);
- e. co-counsel in *Griffey and Ranson v. Magellan Health, Inc.*, U.S. District Court, District of Arizona, Case No. 2:20-cv-01282-MTL (in preliminary settlement) and in *Dearing v. Magellan Health, Inc.*, U.S. District Court, District of Arizona, Case No. 2:20-cv-013648-MTL (settled for \$1.7 million);
- f. co-counsel in *Moose v. Allegacy Federal Credit Union*, Superior Court of Forsyth County, North Carolina (Business Court), Case No. 2020 CVS 4279;
- g. a member of the Plaintiff Steering Committee of Benicar (Olmesartan) Products Liability MDL in the District Court of New Jersey.

Mr. Rhine is honored to act as local counsel on the team representing the State of North Carolina in the PFAS litigation dealing with contamination from the Fayetteville Works plant, where for decades per- and poly-fluoroalkyl forever chemicals were released into our environment, including the Cape Fear River (*State ex rel. Stein v. Chemours et al.*, No. 2020 CVS 5612, Cumberland County Superior Court). The firm also represents the State of North Carolina in six cases dealing with aqueous film forming foam, commonly known as AFFF. These cases, captioned *State ex rel. Stein v. 3M et al.* were filed in state court and most have been removed to federal court and are part of an MDL in South Carolina. They are:

Guilford County – No. 22 CVS 8123 – Piedmont Triad International Airport
Onslow – No. 22 CVS 2812 – Camp Lejeune and MCAS New River
WDNC – No. 3:21-cv-00665 – CLT and Charlotte Air National Guard Base
WDNC – No. 3:21-cv-00664 – Charlotte Police and Fire Training Academy
MDNC – No. 1:21-cv-947 – Stanly County Airport and Air National Guard Base
EDNC – No. 5:21-cv-511 – Seymour Johnson Air Force Base

Mr. Rhine has taken an important and active role in the handling of Camp Lejeune Justice Act

cases on behalf of military members, their families and civilian workers at Lejeune who were exposed to contaminated water and have suffered grievous health consequences, and even death, as a result.

All of these cases have required development of scientific expertise, which has been and remains of Mr. Rhine's most formidable skills.

Additionally, Mr. Rhine and the firm are at the forefront of litigation on behalf of students who have been sexually abused by faculty at their schools. The firm in recent weeks resolved one of these cases, *John Does 1-14 v. The New Hanover County Board of Education, et al.*, Superior Court of New Hanover County, North Carolina, No. 19-CVS-2745, on behalf of young men who were victimized by a stellar teacher – and serial abuser. Two other actions involving abused students are still pending in New Hanover and Guilford counties.

Mr. Rhine and the firm also currently serve as co-counsel on litigation pending class certification regarding substandard military housing at Camp Lejeune in North Carolina (*Burn, et al. v. Lendlease, et al.*) and Fort Belvoir in Virginia (*Fischer, et al. v. Fort Belvoir Residential Communities LLC, et al.*); alleged data breaches (*Smyk, et al. v. Mobile Anesthesiologists* in Cook County, Illinois Chancery Court) and (*McKeown, et al. v. Salud Family Health* in Colorado District Court); and other issues, e.g., *In re Crop Protection Antitrust Litigation (In Re: Crop Protection)*, No. 1:22-cv-01976 (S.D. Ind.).

Mr. Rhine has been recognized as a “Super Lawyer” for over a decade and chosen as one of North Carolina's Top 100 for numerous years. He is listed among the nation's “Best Lawyers,” and Business North Carolina's Legal Elite. He holds an AV rating on Martindale Hubbell. Rhine Law Firm is ranked as a Tier 1 Best Firm by U.S. News and is listed in the National Trial Lawyers Top 100. In 2021, Mr. Rhine was featured on the inaugural Power List of Personal Injury Attorneys by North Carolina Lawyers Weekly.

Mr. Rhine has served in a variety of leadership roles within the larger legal community in North Carolina as former president of the New Hanover County Bar, and as a current member of the Board of Governors for the North Carolina Advocates for Justice.

Ruth A. Sheehan is a second-career North Carolina attorney after an illustrious career as a newspaper reporter and columnist with The News & Observer of Raleigh for two decades. A native of Milwaukee, Ruth attended the University of Wisconsin-Madison, where she double-majored in Journalism and History, graduating with honors. She received her J.D. from the University of North Carolina and has practiced since in the areas of housing, employment, civil rights and claims rooted in negligence, as well as a growing practice in class actions. She was an intern for former NC Court of Appeals judge Linda Stephens, researching and assisting in the drafting of opinions. She has represented clients in hundreds of trials, both bench and jury. She has handled appellate matters numerous times in North Carolina, including briefing to both the COA and state Supreme Court, amicus briefing and oral argument. Since joining the Rhine Law Firm, she has worked on class actions involving data breach, illegal debt collection practices, elevators that crashed due to undersized gears, and institutional sex abuse, among others. Ruth has played a key role on behalf of the state of North Carolina in pursuing claims against corporations responsible for PFAS contamination, and AFFF exposures. She is part of the core group of attorneys seeking justice for

military families consigned to substandard housing at Fort Belvoir, and at Camp Lejeune. Additionally, Ruth has been active in the firm's handling of Camp Lejeune Water Contamination cases under the CLJA. For her work, Ruth has been recognized as a Rising Star in the field. She is a former member of the North Carolina Advocates for Justice and an inaugural and ongoing member of the organization's NEXT Mentoring program for young attorneys. Ruth is a volunteer for the State Bar's Lawyers Assistance Program and has served as one of the trustees the Bar relies on when lawyers pass away or otherwise need to leave their practices. She is a member of the Wake County and New Hanover County bar associations, and was one of the lawyers who helped the Wake County bar rewrite its social media and media policies. She is a board member for North Carolina Health News, an online health and medicine news organization for which she also provides pro bono legal services.

John Bruno spent the first five years of his legal career practicing at large firms in Charlotte before joining the Rhine Law Firm. He has extensive experience litigating in both federal and state court across North Carolina, handling matters of all sizes. John is also honored to have served as a judicial intern to the Honorable Graham Mullen in the Western District of North Carolina. John attended Auburn University for undergraduate where he graduated summa cum laude while majoring in finance, and went on to study law at the University of Notre Dame.